



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Gregory C. Ehlke, Treasurer  
CitiGroup Inc. Political Action Committee  
153 East 53<sup>rd</sup> Street  
New York, NY 10043

OCT 8 1999

Identification Number: C00039305

Reference: July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99) and September Monthly (8/1/99-8/31/99) Reports

Dear Mr. Ehlke:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free

number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Dominick Ciaraldi".

**Dominick Ciaraldi**  
**Reports Analyst**  
**Reports Analysis Division**

## PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate attachment for each category of the Double Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(1)		
Any information shown here must appear on the donor's Form W-2, Form 1099, or other document for the purpose of substantiating the deduction. Other than using the name and address of any political committee to which contributions were made.						
NAME OF COMMITTEE (in Full)						
National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (Month, Day, Year)	Amount of Each Receipt for Period	
Anne Sullivan 21 10th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$80.00	
Receipt for _____		Occupation		Aggregate Year-to-Date	(\$80)	
Care (month) _____		Branch Manager		8/16	(biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (Month, Day, Year)	Amount of Each Receipt for Period	
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$190.00	
Receipt for _____		Occupation		Aggregate Year-to-Date	(\$190)	
Care (month) _____		Vice President		8/60	(biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate attachment for each category of the Double Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(1)		
Any information shown here must appear on the donor's Form W-2, Form 1099, or other document for the purpose of substantiating the deduction. Other than using the name and address of any political committee to which contributions were made.						
NAME OF COMMITTEE (in Full)						
National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (Month, Day, Year)	Amount of Each Receipt for Period	
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		8/18/04	\$5,999.00	
Receipt for _____		Occupation		Aggregate Year-to-Date	(\$5,999)	
Care (month) _____		CHAIRMAN		2,829.00	(TRAFLE PRIZE)	

SCHEDULE B		ITEMIZED DEDUCTIONS		Use separate attachment for each category of the Double Summary Page	PAGE	OF
Operating Expenditures/Other Federal				FOR LINE NUMBER 21(b)		
Any information shown here must appear on the donor's Form W-2, Form 1099, or other document for the purpose of substantiating the deduction. Other than using the name and address of any political committee to which contributions were made.						
NAME OF COMMITTEE (in Full)						
National Organization PAC 00000001						
A. Full Name, Mailing Address and ZIP Code		Purpose or Description		Date (Month, Day, Year)	Amount of Each Receipt for Period	
Martin L. Kress 4 River Road City, State ZIP		TRAFLE PRIZE		8/18/04	\$5,999.00	
Receipt for _____		Deduction for _____		Aggregate Year-to-Date	(\$5,999)	
Care (month) _____					(IN-KIND CONTRIBUTION)	

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 18 pay periods have passed, and the manager's contributions reach \$270. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page B for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.